

SUPPORTING STATEMENT

A. Justification:

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

Circumstances Necessitating Change to Information Collection: The Federal Communications Commission (FCC or Commission) is requesting Office of Management and Budget (OMB) approval of a revision of this information collection. The revision pertains to a *Report and Order*, and *Order on Reconsideration (Report and Order and Order on Reconsideration)* adopted by the Commission on May, 25, 2016, as FCC 16-63.¹ The *Report and Order* and *Order on Reconsideration* adopt improvements to the Commission's Part 4 rules governing disruptions to communications. We estimate that the adoption of these final rules would lead to a net decrease in the reporting burdens associated with this information collection.

In 2004, the Commission superseded the original reporting requirements,² and created a new Part 4 of Title 47 of the Code of Federal Regulations (C.F.R.) for modified and expanded outage reporting requirements embodied in the existing service disruption rules.³ In 2012, the Commission further expanded its Part 4 outage reporting requirements⁴ to include interconnected voice over Internet protocol (VoIP) providers.⁵

¹ See *Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications; New Part of the Commission's Rules Concerning Disruptions to Communications, The Proposed Extension of Part 4 of the Commission's Rules Regarding Outage Reporting to Interconnected Voice Over Internet Protocol Service Providers and Broadband Internet Service Providers*, PS Docket Nos. 15-80 and 11-82, ET Docket No. 04-35, Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking, 31 FCC Rcd 5817 (2016) (*Part 4 Report and Order and Order on Reconsideration*).

² Since 1992, the Commission has required telecommunications carriers (other than cellular and satellite providers) to report significant disruptions to voice and paging communications services. See former 47 C.F.R. Section 63.100 (2003) (first adopted in 1992). See *In the Matter of Notification by Common Carriers of Service Disruptions*, CC Docket No. 91-273, Report and Order, 7 FCC Rcd 2010 (1992); *Amendment Of Part 63 Of The Commission's Rules To Provide For Notification By Common Carriers Of Service Disruptions*, CC Docket No. 91-273, Memorandum Opinion and Order and Further Report and Order of Proposed Rulemaking, 8 FCC Rcd 8517 (1993); *Amendment Of Part 63 Of The Commission's Rules To Provide For Notification By Common Carriers Of Service Disruptions*, CC Docket No. 91-273, Second Report and Order, 9 FCC Rcd 3911 (1994); *Amendment Of Part 63 Of The Commission's Rules To Provide For Notification By Common Carriers Of Service Disruptions*, CC Docket No. 91-273, Order on Reconsideration, 10 FCC Rcd 11764 (1995).

³ See *New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, ET Docket No. 04-35, Report and Order and Further Report and Order of Proposed Rulemaking, 19 FCC Rcd 16830 (2004) (*Part 4 Order*).

⁴ 47 C.F.R. Part 4.

⁵ See *Proposed Extension of Part 4 of the Commission's Rules Regarding Outage Reporting to Interconnected Voice Over Internet Protocol Service Providers and Broadband Internet Service Providers*, PS Docket No. 11-82, Report and Order, 27 FCC Rcd 2650 (2012).

Proposed Revisions to Information Collection Requirements: The *Report and Order* and *Order on Reconsideration* adopt modifications to the Part 4 outage reporting rules. In issuing these modifications, the *Report and Order* and *Order on Reconsideration* seek to build on the Commission’s decade of experience administering the Part 4 outage reporting rules and the associated Network Outage Reporting System (NORS). In particular, the *Report and Order* and *Order on Reconsideration* adopt the following changes to the rules.

- Replace the current metric for reporting major transport facility outages from a DS3-based standard to an OC3-based standard, with an appropriate threshold adjustment from 1,350 DS3 minutes for 30 minutes to 667 OC3 minutes for 30 minutes;
- Require reporting of simplex outages that persist for at least 96 hours;
- Clarify the requirement to report outages that significantly degrade communications to a Public Safety Answering Point (PSAP);
- Adopt a common, technologically neutral method for calculating the number of wireless users “potentially affected” by an outage;
- Clarify the reporting metric for estimating the number of “potentially affected” wireless users for outages that affect a PSAP;
- Amend definition for special offices and facilities to those entities enrolled in the Telecommunications Service Priority (TSP) Program at priority level 1 or level 2;
- Update outage reporting requirements for disruptions that affect airports, to disruptions impacting airports listed as current primary (PR) airports in the FAA’s National Plan of Integrated Airports Systems; and
- Limit outage reporting requirements involving airports to defined critical communications outages that potentially affect an airport.

Statutory authority for this collection of information is contained in 47 U.S.C. sections 151, 154(i)-(j) & (o), 201(b), 214(d), 218, 251(e)(3), 301, 303(b), 303(g), 303(r), 307, 309(a), 316, 332, 403, 615a-1, and 615c.

This information collection does not affect individuals or households; thus, there are no impacts under the Privacy Act.

2. Indicate how, by whom and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

As stated in previous filings for this information collection,⁶ the general purpose of the Commission’s Part 4 rules is to gather sufficient information regarding disruptions to telecommunications to facilitate FCC monitoring, analysis, and investigation of the reliability and security of voice, paging, and interconnected VoIP communications

⁶ See, e.g., *Supporting Statement, OMB Control No. 3060-0484, Section 4.9, Part 4 of the Commission’s Rules Concerning Disruptions to Communications* at 3 (August 2014) (*2014 Supporting Statement*).

services, and to identify and act on potential threats to our Nation's telecommunications infrastructure. The Commission uses this information collection to identify the duration, magnitude, root causes, contributing factors with respect to significant outages, and to identify outage trends; support service restoration efforts; and help coordinate with public safety officials during times of crisis. The Commission also maintains an ongoing dialogue with reporting entities, as well as with the communications industry at large, generally regarding lessons learned from the information collection in order to foster a better understanding of significant outages' root causes, and to explore preventive measures in the future so as to mitigate the potential scale and impact of such outages.

Collection of such information through NORS has already been approved by OMB, and the *Report and Order* and *Order on Reconsideration* do not adopt rules that would alter the fundamental aims and purposes of the approved collection.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The Part 4 information collection is administered by the FCC's Public Safety and Homeland Security Bureau (PSHSB), which maintains an Internet portal for the electronic submission of NORS reports.⁷ This electronic filing requirement entails entering the required information using the Commission-approved Web-based outage report templates that are available online at the NORS Internet Web portal. The completion of these online templates results in the information being electronically entered into the Commission's NORS reporting data base in real-time. Reporting entities may have some users that have full access to all the outage reports submitted by the company, and other users that only have access to outage reports that they have submitted. When updating any report, users have access to all the information that was previously submitted about that outage; this saves time in filing outage reports. In addition, the NORS reporting system is equipped with an interface to accept and support outage filings that are submitted by a reporting entity's automatic filing system.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in item 2 above.

⁷ See 47 C.F.R. 4.11. Network Outage Reporting System Portal, <https://www.fcc.gov/network-outage-reporting-system-nors> (last accessed Nov. 21, 2016). In the event of technical impediments to using the Web-based system, written notifications, initial reports, or final reports may be submitted to the Commission by email, fax, courier, or U.S. mail. See 47 C.F.R. 4.11; *New Part 4 of the Commission's rules Concerning Disruptions to Communications*, ET Docket No. 04-35, Report and Order and Further Notice of Proposed Rulemaking, 19 FCC Rcd 16830, 16871-72, para. 75 (2004).

The requirements set forth in the *Report and Order* and *Order on Reconsideration* are aimed at closing gaps in, or updating the current rules governing the reporting of communications disruptions. The reporting would not be duplicative of information that the Commission already receives.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The *Report and Order* and *Order on Reconsideration* do not relieve small providers, in whole or in part, from the rules. However, the Commission explained in the Final Regulatory Flexibility Analysis (FRFA) that accompanied the *Report and Order* and *Order on Reconsideration* its belief that “outage reporting triggers are set sufficiently high as to make it unlikely that small businesses would be impacted significantly by the final rules,” and that it “anticipate[s] that in many instances, small businesses will find their burden decreased by the new reporting thresholds.”⁸ In particular, the replacement of the DS3-based reporting threshold for transport facility outages with a higher OC3-based threshold could have a particularly beneficial impact on smaller providers, who may be likely to suffer disruptions that qualify as reportable outages under the current but not under the replacement threshold. In addition, to allow flexibility for smaller carriers, the Commission provides implementation timeframes for a number of requirements, including the adoption of a requirement for a 911 service provider to report loss of communications when at least 80 percent of its trunks serving a PSAP become impaired to the point that they cannot support 911 call delivery in accordance with the Commission’s rules.⁹

6. Describe the consequences to a Federal program or policy activity, if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reduce burden.

The Commission has a statutory mandate to “promot[e] the safety of life and property through the use of wire and radio communications,”¹⁰ and Congress has delegated to the Commission specific responsibilities to “designate 911 as the universal emergency telephone number for reporting an emergency to appropriate authorities and requesting assistance.”¹¹ The Commission’s efforts to ensure that such reports and requests for assistance can reliably be transmitted are “necessary in the public interest to carry out” these provisions of the Communications Act.¹² Outage reporting provides the

⁸ *Part 4 Report and Order and Order on Reconsideration*, 31 FCC Rcd at 5920, app. D, para. 18.

⁹ *Part 4 Report and Order and Order on Reconsideration*, 31 FCC Rcd at 5839, para. 53.

¹⁰ 47 U.S.C. § 151.

¹¹ 47 U.S.C. § 251(e)(3).

¹² 47 U.S.C. § 201(b). See also IP-Enabled Services; E911 Requirements for IP-Enabled Service Providers, *First Report and Order and Report and Order of Proposed Rulemaking*, 20 FCC Rcd 10245 ¶ 34 (2005), *aff’d sub nom. Nuvio Corp. v. FCC*, 473 F.3d 302 (D.C. Cir. 2007) (*VoIP 911 Order*) (recognizing plenary authority under Section 251(e) to require “network changes” needed to ensure safe, reliable, nationwide

Commission with timely and reliable data that enables the Commission to monitor the reliability of these networks. The *Report and Order* and *Order on Reconsideration* adopt measures to refine outage reporting rules to “reflect advancements” since the Commission last adopted rules in 2012.¹³ For example, the Commission adopts a change to modernize the reporting metric used for major transport facility outages recognizing that the current metric is unhelpful for outage analysis.¹⁴

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the criteria listed in supporting statement.

This revised information collection is consistent with the requirements of 5 C.F.R. § 1320 and the criteria listed in this Supporting Statement. We do not anticipate circumstances that would result in a collection of information in an inconsistent manner.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's Report and Order, required by 5 CFR 1320.8(d), soliciting comments on the information prior to submission to OMB. -Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

The Commission published a Federal Register Notice (81 FR 62128) on September 8, 2016, seeking comments on some information collection requirements contained in this supporting statement. There were no comments received from the public as a result of this notice.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payment or gift to respondents has been or will be made in connection to this information collection.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Outage reports filed with the Commission pursuant to Part 4, and the information contained therein, are presumed confidential.¹⁵ The filings are shared with the Department of Homeland Security through a password-protected real time access to

911 system).

¹³ *Part 4 Report and Order and Order on Reconsideration*, 31 FCC Rcd at 5821, para. 10.

¹⁴ *Part 4 Report and Order and Order on Reconsideration*, 31 FCC Rcd at 5822-23, paras. 11-12, and n. 22.

¹⁵ See 47 C.F.R. 4.2.

NORS. Other persons seeking disclosure must follow the procedures delineated in 47 C.F.R. Sections 0.457 and 0.459 of the Commission's rules for requests for and disclosure of information. The revisions noted in this information collection do not affect the confidential treatment of information provided to the Commission through outage reports filed in NORS.

11. Provide additional justification for any questions of a sensitive nature.

This collection of information does not address any matters of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should: indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance.

Number of Respondents: The Commission has previously reported that the number of respondents required to submit information under the Part 4 rules would not exceed 1,100.¹⁶ As the requirements in this *Report and Order* and *Order on Reconsideration* involve incremental adjustments to reporting requirements that are already in place, and would not expand the applicability of the rules to cover new classes of entities, we adjust the current estimate to **798** respondents.

Frequency of Response: The Commission previously reported a total of 15,444 responses per year for all existing outage reporting obligations under Part 4.¹⁷ The *Report and Order* and *Order on Reconsideration* adopt requirements that will result in an estimated net decrease of 2,432 responses per year,¹⁸ for a total of **13,012**¹⁹ responses per year for the adjusted outage reporting obligations. These estimates derive, in part, from the Commission's analysis of current and historical reporting volumes, which provides an evidentiary basis for estimating the incremental impact of the requirements adopted in the *Report and Order* and *Order on Reconsideration*. The estimated impact of each adopted requirement is as follows:

- Replace the current reporting metric and threshold (based on "DS3 minutes") for major transport facility outages with a reporting metric and threshold

¹⁶ See 2014 Supporting Statement at 8-9.

¹⁷ See 2014 Supporting Statement at 9.

¹⁸ See *Part 4 Report and Order and Order on Reconsideration*, 31 FCC Rcd at 5854-55, para. 90, note 273 ("[t]he combined estimated impact of this Order will be to raise the number of reports by 520, while simultaneously reducing the number of reports by 2,952, for a net decrease of 2,432 reports per year.").

¹⁹ 15,444 – 2,432 = 13,012.

based on optical (i.e., OC3 minutes) transmission rates:

The Commission adjusts the current reporting threshold for major transport facility outages, which is based on the DS3 circuits with a higher threshold based on higher-capacity OC3 circuits (or their equivalent). We estimate that adoption of this requirement will reduce the number of reports filed annually by **2,835**.²⁰ This is based on an estimate of the volume of reports filed in recent years that would be reportable under the current threshold but not reportable under the adopted threshold.

- Require reporting of simplex outages that persist for at least 96 hours;

The Commission adopts a requirement that “simplex” outages, which are outages that involve the failure of a backup path in a high-capacity circuit, be reportable when they persist for at least 96 hours. This change is based on evidence that providers are not adhering to the best practice of timely repairing simplex outages during daily maintenance windows. The Commission estimates that this requirement, combined with the change in the DS3 metric and threshold, will result in the filing of an additional **510** reports per year.²¹ This is based on an assumption that reducing the reporting threshold from five days to 96 hours at most would increase the number of reports by 50 percent.²²

- Clarify the requirement to report outages that significantly degrade communications to a PSAP;

The Commission clarifies that significant degradations of communications to a PSAP may be reportable outages even if the PSAP does not experience a *complete* loss of service.²³ The Commission is aware of only a handful of events in recent years that appear to fall in this category, but we estimate conservatively that **10** additional reports will be filed per year under this requirement.²⁴

²⁰ See *Part 4 Report and Order and Order on Reconsideration*, 31 FCC Rcd at 5854-55, para. 90, note 273; see also *Supporting Statement, OMB Control No. 3060-0484, Section 4.9, Part 4 of the Commission’s Rules Concerning Disruptions to Communications*, at 7 (June 2015) (*2015 Supporting Statement*).

²¹ The Commission adopts a modified requirement from the originally proposed change; 96 hours instead of 48 hours. See *Part 4 Report and Order and Order on Reconsideration*, 31 FCC Rcd at 5828-30, 5854-55, paras. 24, 26-29, 90, note 273.

²² See *Part 4 Report and Order and Order on Reconsideration*, 31 FCC Rcd at 5854-55, para. 90, note 273.

²³ See *Part 4 Report and Order and Order on Reconsideration*, 31 FCC Rcd at 5838-39, paras. 50-54.

²⁴ See *Part 4 Report and Order and Order on Reconsideration*, 31 FCC Rcd at 5854-55, para. 90, note 273 (“Outages that “significantly degrade 911 communications” are relatively rare, and no such outage occurred in 2015. Accordingly, we estimate that there would be at most 10 reports per year.”); see also *2015 Supporting Statement* at 6.

- Adopt a common, technologically neutral method for calculating the number of wireless users “potentially affected” by an outage;

The Commission clarifies the methodology by which providers calculate the number of users potentially affected by a wireless outage. Of two approaches proposed to determine whether an outage event meets the 900,000 user-minute threshold, the Commission adopts a methodology that a provider must multiply the number of disabled macro cell sites in the outage by the average number of users served per site, calculated as the total number of users for the provider divided by the total number of the provider’s macro cell sites.²⁵ As we have sought comment on and stated in the past, we do not expect this clarification to have any appreciable cost impact.²⁶

- Clarify the reporting metric for estimating the number of “potentially affected” wireless users for outages that impact PSAPs;

The Commission adopts a methodology to calculate the number of users potentially affected by a wireless outage that affects only a subset of the PSAPs served by a mobile switching center. Providers are to allocate capacity in reasonable proportion to the size of the subtending PSAP(s) in terms of number of users.²⁷ It is not expected that this proposal will have any appreciable cost impact.²⁸

- Update the requirements that mandate reporting of outages that affect airports and other “special offices and facilities.”

The Commission adopts a definition for “special offices and facilities” for purposes of Part 4, and clarifies that reporting requirements for outages that potentially affect an airport and apply to those airports determined by the FAA to provide commercial service and only when the event affects critical communications at covered airports.²⁹ We adopt an exemption for wireless carriers from being required to report outages potentially affect-

²⁵ See *Part 4 Report and Order and Order on Reconsideration*, 31 FCC Rcd at 5832, paras. 35-36.

²⁶ See *2015 Supporting Statement* at 8; *Part 4 Report and Order and Order on Reconsideration*, 31 FCC Rcd at 5832, paras. 35-36 (“[w]e agree with commenters that this approach is simpler than the current measurement and can be implemented at little to no additional cost”).

²⁷ See *Part 4 Report and Order and Order on Reconsideration*, 31 FCC Rcd at 5834, para. 42.

²⁸ See *2015 Supporting Statement* at 8.

²⁹ See *Part 4 Report and Order and Order on Reconsideration*, 31 FCC Rcd at 5842-43, 5846-47, paras. 63-65, 74-76.

ing all special offices and facilities.³⁰ We estimate that adoption of the clarifications relating to airports and other special offices and facilities will reduce the number of reports filed by **117**.³¹

In sum: (-2,835) + (510) + (10) + (0) + (0) + (-117) = (-2,432) reports due to requirements adopted in the *Report and Order* and *Order on Reconsideration*.

Annual Hour Burden: The existing information collection already approved by OMB includes three components: a Notification that an outage event has occurred, an Initial Report containing detailed information on the outage event, and a Final Report containing detailed information on the outage event and how the event was resolved. We have previously estimated that reporting entities will require 15 minutes to file a Notification with the Commission and that the more detailed Initial Report will ordinarily not take more than 45 minutes to complete and submit to the Commission.³² We further estimated that respondents will ordinarily not need more than one hour to complete and submit electronically a Final Report to the Commission within 30 days after the outage was discovered.³³ Thus, the total time needed to file all reports pertinent to each outage that meets or exceeds the reporting threshold criteria has been estimated to be less than two (2) hours as follows:

$$\begin{aligned} &15 \text{ minutes [Notification]} + 45 \text{ minutes [Initial Report]} + 1 \text{ hour [Final Report]} \\ &= 2 \text{ hours maximum.}^{34} \end{aligned}$$

We believe these estimates remain valid. Indeed, we noted previously that the two-hour estimate was conservative and that time required to file each report was, "more likely, estimated to be approximately 1 to 1.5 hours."³⁵

Additional Burden hours: (-2,432) additional reports filed annually * 2 hours per report = (-4,864) hours annual burden. A total net reduction of 4,864 burden hours due to the requirements adopted in the *Report and Order* and *Order on Reconsideration*.

Additional In-House Cost: (-2,432) additional reports filed annually * 2 hours per report * one technician at \$80.00/hour = (-\$389,120). A total net reduction of \$389,120 in in-house cost.

³⁰ See *Part 4 Report and Order and Order on Reconsideration*, 31 FCC Rcd at 5848, para. 80.

³¹ See *Part 4 Report and Order and Order on Reconsideration*, 31 FCC Rcd at 5854-55, para. 90, note 273; *2015 Supporting Statement* at 8.

³² *2015 Supporting Statement* at 9; *2014 Supporting Statement* at 9.

³³ See *id.*

³⁴ See *2015 Supporting Statement* at 9; *2014 Supporting Statement* at 9.

³⁵ See, e.g., *Supporting Statement, OMB Control No. 3060-0484, Sections 4.1 and 4.2 and Part 4 of the Commission's Rules Concerning Disruptions to Communications (NORS)* at 11 (July 2012) (*2012 Supporting Statement*).

In 2014, we previously estimated a total of 29,870 annual burden hours and this translates to an estimated \$2,389,600 in annual in-house costs for outage reporting obligations under Part 4.³⁶ The revisions discussed here decrease those estimates by 4,864 burden hours for a total of 25,006 burden hours³⁷ and \$2,000,480³⁸ in annual in-house costs.

Method of Calculating Burden: We explain above how we calculated the impact on reporting burdens associated with the various modifications adopted in the *Report and Order* and *Order on Reconsideration*.

Variance in Burden: We expect that the limited impact of the revision to be shared widely among entities that are subject to Part 4, although we expect that larger entities will continue to be more likely than smaller ones to experience outages of sufficient scale to trigger a reporting obligation.

Summary of Respondents and Burden:

Total Number of Respondents: 798.

Total Number of Annual Responses: 13,012.

Total Annual Burden Hours: 25,006 hours.

Total Annual In-House Costs: \$2,000,480.

13. Provide estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in items 12 and 14).

We previously estimated no capital and startup costs, no purchases of additional equipment, or operation, maintenance, and purchase of services costs associated with existing Part 4 outage reporting obligations. The new requirements will not result in additional operating and maintenance expenses. Therefore, the total remains \$0.

14. Provide estimates of annualized costs to the Federal government. Also provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expenses that would not have been incurred without this collection of information.

³⁶ See 2014 Supporting Statement at 10 (29,870 annual burden hours x \$80 per hour = \$2,389,600).

³⁷ 29,870 annual burden hours - 4,864 annual burden hours reduced = 25,006 annual burden hours.

³⁸ \$2,389,600 - \$389,120 = \$2,000,480.

**Part 4 of the Commission’s Rules Concerning
Disruptions to Communications**

**3060-0484
August 2016**

We previously estimated \$454,542.40 in total annual costs to the Federal government for administration of all Part 4 outage reporting requirements.³⁹

We now estimate that the total annual cost to the Federal Government to be as follows, based on the salaries⁴⁰ of three engineers (GS-15 step 5), two engineers (GS-14 step 5), an IT Developer (GS-15 step 5), each spending approximately ½ (or 1040 hours) of their work time each year on the information collected, and two attorneys (GS-13 step 5) spending approximately ¼ (or 520 hours) of their work time each year on the information collection:

(Three) Engineers	GS-15 step 5	at \$69.56/hr wage	\$69.56 x 1040 hours	x 3	= \$ 217,027.20
(Two) Engineers	GS-14 step 5	at \$59.13/hr wage	\$59.13 x 1040 hours	x 2	= \$ 122,990.40
(One) IT Developer	GS-15 step 5	at \$69.56/hr wage	\$69.56 x 1040 hours	x 1	= \$ 72,342.40
(Two) Attorneys	GS-13 step 5	at \$50.04/hr wage	\$50.04 x 520 hours	x 2	= \$ 52,041.60
TOTAL					= \$ 464,401.60

Total Annual Cost to the Federal Government: \$464,401.60.

The adopted requirements will result in a decrease in the number of reports reviewed by Commission staff each year. Further, we adjust the number of, and the respective salaries for Commission employees reviewing reports to the current configuration. The projected decrease of 2,432 reports per year and the Commission personnel costs adjustments will have an impact on the costs of the Federal government in administering the network outage reporting program. We therefore adjust the estimate to \$ 464,401.60.

15. Explain the reasons for any program changes or adjustments for this information collection.

In the *Report and Order* and *Order on Reconsideration*, the Commission adopts the information collection requirements as presented above, which resulted in a program change/decrease to this collection. The following decreases will be added to OMB’s inventory: the total number of respondents decreased from 1,100 to 798 (-302), the total number of responses decreased from 15,444 to 13,012, (-2,432), and the total annual burden hours decrease from 29,870 to 25,006, (-4,864).

³⁹ See 2014 Supporting Statement at 11-12;

⁴⁰ Hourly rates are based on the OPM 2016 Washington-Baltimore-Arlington, DC-MD-VA-WV-PA Locality Pay Area. Office of Personnel and Management, 2016 General Schedule (GS) Locality Pay Table, Salary Table 2016-DCB, https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2016/DCB_h.pdf (last accessed August 17, 2016).

16. For collections of information whose results will be published, outline plans for tabulation and publication.

The FCC does not plan to publish this information.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The Commission does not intend to seek approval not to display the expiration date of the revisions to this information collection.

18. Explain any exceptions to the Certification Statement identified in Item 19, "Certification of Paperwork Reduction Act Submissions."

There are no exceptions to the Certification Statement.

B. Collections of Information Employing Statistical Methods:

The revisions to this information collection do not employ any statistical methods.